



156771

Ethyl Petroleum Additives
Sauget, Illinois 62201
(618) 274-4000

December 16, 1985

Mr. Nicholas Longo
On-Scene Coordinator
Attention: 5HE-12
U.S. E.P.A.
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Longo:

RE: ADMINISTRATIVE ORDER V-W-84-007 RESPONSE ISSUED ON PROPOSED GROUND WATER SAMPLING PLAN AND SOIL SAMPLING FOR 2,3,7,8-TCDD DATED OCTOBER 23, 1985

Ethyl Petroleum Additives submitted to the Agency on October 23, 1985, a proposed ground water sampling plan and a plan for additional soil sampling to verify the absence or quantify the presence of 2,3,7,8-TCDD. A reply on your comments of our proposed ground water sampling plan will be forthcoming. As requested soil samples were taken along track 23 and track 24 for 2,3,7,8-TCDD analysis. In addition to these samples, as mentioned in our reply of October 23, 1985, an additional re-sample was taken at location 33 (1080N-315E). Ethyl Petroleum Additives plans to construct six tanks in the area bounded by 1000N to 1100N and 285E to 330E. Previous analysis of 2,3,7,8-TCDD for the two locations in this area were near the 1.0 PPB level (1.8 PPB and 1.3 PPB) for surface samples and less than 1.0 PPB for sub-surface samples. Since duplicate results for soil samples at these concentration levels vary significantly, Ethyl Petroleum Additives believed that a re-sample was necessary in order to obtain a more accurate quantification of 2,3,7,8-TCDD in this area. A sample at location 59 (1050N-300E) was not taken due to an oversight on our part. EPAD will obtain a re-sample at this location if the Agency so requires. This sample location, however, is inside the track 21 area and no construction is planned in this area. The results of the analysis of soil samples taken are attached in the table (B-1) from Envirodyne Engineers, Inc. The identification of the sample number is attached in Exhibit I.

The analysis of the re-sample at location 33 (1080N-315E) was below 1.0 PPB. We believe this analysis more accurately represents the 2,3,7,8-TCDD contamination in this area. Since the analysis is below the guidelines as set by the Center For Disease Control, Ethyl Petroleum Additives believes that the area bounded by 1000N to 1100N and 285E to 330E imposes no health hazard to workers and hence, should be free from construction restraints.

Analysis of samples along track 23 also showed concentration of 2,3,7,8-TCDD being less than 1.0 PPB to non-detected. These analysis confirm that there is no significant contamination in this area and subsequently the area along track 23 north of the significantly contaminated area to the northern boundary of the facility should be cleared of construction restraints.

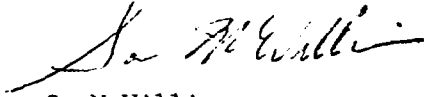
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Page Two

We would appreciate your reply on these requests as soon as possible. If you have any questions, please call me at 618-274-4000.

Sincerely yours,



S. McWilliams
Site Manager

SMcW:dj

cc: Mr. Norman Niedergang, Chief
CERCLA Enforcement Section
Attention: 5HE-12
U.S. E.P.A.
Region V
230 S. Dearborn St.
Chicago, IL 60604

TABLE B-1 - TCDD DATA REPORT FORM

Page 1 of 1

Lab: Envirodyne Engineers, Inc.Case No.: 2086-00257Report Date: 11/15/85

Batch/Shipment No.: _____

Column: Sp 2330

Sample Number	1985 ED ^b	EC ^b	Wet Weight (grams)	TCDD (ppb)		GC/MS Analysis			Relative Ion Abundance		Surrogate (ng)		Relative Ion Abundance						FRN No.
				Meas.	D.L.	I.D.	Date	Time	320/ 322	332/ 334	Meas.	% Accy	320	322	257	328 ^a	332	334	
OCL 35045N	11/4	Y	10.13	0.92	-	4	11/9	1553	0.79	0.79	10.7	107	6951	8783	3177	20727	40056	51009	T1492
OCL 34043	11/4	Y	10.08	ND	0.018	4	11/9	1631	0.48	0.79	10.8	108	78	164	509	41340	79583	100793	T1493
Method Blank	11/4	Y	10.0	ND	0.041	4	11/9	1708	1.12	0.78	10.2	102	280	249	705	37417	75580	96854	T1494
Site A	11/4	Y	10.04	0.18	-	4	11/9	1739	0.85	0.79	10.5	105	2801	3292	1006	41445	81939	104261	T1495
Site B	11/4	Y	10.25	0.13	-	4	11/9	1848	0.83	0.79	10.4	104	1655	1985	693	31786	63698	81125	T1496
Site C	11/4	Y	10.09	ND	0.16	4	11/9	1927	0.62	0.78	10.3	103	591	946	33	27698	55670	71578	T1497
Site D	11/4	Y	10.14	ND	0.082	4	11/9	1958	0.86	0.78	10.6	106	204	238	357	16007	31230	40187	T1498
Site E	11/4	Y	10.09	ND	0.077	4	11/9	2026	0.47	0.78	10.4	104	127	269	116	15011	29831	38382	T1499

Notes: RB = Reagent Blank MB = Method Blank
 FB = Field Blank FRN = File Reference Number

D = Duplicate/Fortified Field Blank
 D.L. = Detection Limit

N = Native TCDD Spike R = Rejected Data
 ND = Not Detected

^aCorrected for contribution by native TCDD; 0.9% of m/z 322 subtracted.

EXHIBIT - I

SAMPLE NUMBER

IDENTIFICATION

SITE A

LOCATION 33
(1080N-315E)

SITE B

ALONG TRACK 23 AT
INTERSECTION 1200N

SITE C

ALONG TRACK 23 AT
INTERSECTION 1400N

SITE D

ALONG TRACK 23 AFTER
JUNCTURE WITH TRACK 21

SITE E

ALONG TRACK 23 BEFORE
JUNCTURE WITH TRACK 24